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March 22, 2023

VIA ECF

Hon. J. Paul Oetken
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Noel Sanabria, 21-cr-313 (JPO)

Dear Judge Oetken:

I am CJA counsel to Noel Sanabria. I write to respectfully request a one-time modification to Mr. Sanabria's bail conditions to permit him to travel on April 1, 2023 to Hackensack, New Jersey to take his mother to his brother's gravesite.

Pre-Trial Services Officer Viosanny Harrison has indicated that Pre-Trial has no objection to this request and the government has informed the defense that it defers to Pre-Trial Services.

Mr. Sanabria has been fully compliant with the terms of his release.

He respectfully requests that he be permitted to leave his home on April 1, 2023 at 8am and return by 10pm so that he may take his mother to his brother's gravesite in Hackensack, New Jersey and spend the day with her.

As noted, Pre-Trial Services has no objection to this request and the government defers to Pre-Trial Services.

Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Respectfully submitted,

/s/

David S. Greenfield

cc: All Parties (via ECF)
Pre-Trial Services Officer Viosanny Harrison (via email)